INITIAL CONFERENCE QUESTIONNAIRE

1.	Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: March 25, 2011
2.	If additional interrogatories beyond the 25 permitted under the federal rules are needed, the maximum number of: plaintiff(s) and defendant(s)
3.	Number of depositions by plaintiff(s) of: parties non-parties
4.	Number of depositions by defendant(s) of: parties non-parties
5.	Date for completion of factual discovery: February 23, 2012
6.	Number of expert witnesses of plaintiff(s): medical2 non-medical
	Date for expert report(s): March 23, 2012
7.	Number of expert witnesses of defendant(s): medical2 non-medical
	Date for expert report(s): March 23, 2012
8.	Date for completion of expert discovery: <u>April 23</u> , 2012
9.	Time for amendment of the pleadings by plaintiff(s) <u>July 1, 20</u> 11 or by defendant(s) <u>September 2</u> , 2011
10.	Number of proposed additional parties to be joined by plaintiff(s) and by defendant(s) and time for completion of joinder:
11.	Types of contemplated dispositive motions: plaintiff(s): defendant(s): summary judgment
12.	Dates for filing contemplated dispositive motions: plaintiff(s): June 25, 2012 defendant(s): June 25, 2012
13.	Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. At this time, electronic discovery is believed to be limited to any relevant pay records, time records, schedules and training modules.
14.	Have counsel reached any agreements regarding disclosure of experts' work papers (including drafts) and communications with experts? If so, please describe at the initial conference. Not at this time.
15.	Will the parties *consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (Answer no if any party declines to consent without indicating which party has declined.) Yes No _x

^{*} The fillable consent form may be found at http://www.nyed.uscourts.gov/General_Information/Court_Forms/court_forms.html and may be filed electronically upon completion prior to the initial conference, or, brought to the initial conference and presented to the Court for processing.